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1 2 3 4 5 6	COOLEY LLP RONALD S. LEMIEUX (120822) (rlemieux VIDYA R. BHAKAR (220210) (vbhakar@c SHANÉE Y.W. NELSON (221310) (snelson 3000 El Camino Real Five Palo Alto Square Palo Alto, CA 94306-2155 Telephone: 650-843-5000 Facsimile: 650-849-7400  Attorneys for Defendant and Counterclaiman ChipMOS Technologies, Inc.	ooley.com) ⊞ÒËÆÅ åÆ€Ð ÐÆFF⊞	
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13	Attorneys for Plaintiff and Counterclaim-Defendant		
14	Freescale Semiconductor, Inc.		
15	UNITED STATES DISTRICT COURT		
16	NORTHERN DISTRICT OF CALIFORNIA		
17	SAN JOSE DIVISION		
18	Freescale Semiconductor, Inc., a corporation,	CASE NO. 5:09-CV-03689-JF-PSG	
19	Plaintiff,	STIPULATED REQUEST TO MODIFY BRIEFING SCHEDULE RE CHIPMOS'	
20	VS.	MOTION FOR RECONSIDERATION; DECLARATION OF SHANÉE Y. W.	
21	ChipMOS Technologies, Inc., a	NELSON; <b>FROPOSED</b> ORDER	
22	corporation,	JURY TRIAL DEMANDED	
23	Defendant.		
24		Complaint filed: July 13, 2009	
25	AND RELATED COUNTERCLAIMS.	Trial Date: TBD	
26			
27			
28		STIPULATED REQUEST TO MODIFY BRIEFIN	

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1	Pursuant to Local Rule 6-2, Plaintiff and Counterclaim Defendant Freescale	
2	Semiconductor, Inc. ("Freescale") and Defendant and Counterclaimant ChipMOS Technologies,	
3	Inc. ("ChipMOS") jointly submit this Stipulated Request for an extension of time to file and serve	
4	their Opposition and Reply briefs regarding ChipMOS' Motion for Reconsideration.	
5	The dates for filing the Response and the Reply were set by the Court's Order filed	
6	September 22, 2011 [Docket No. 156]. Under the September 22, 2011 Order, ChipMOS' opening	
7	brief is currently due on October 17, 2011, Freescale's Opposition is currently due on October	
8	31, 2011, and ChipMOS' Reply is currently due on November 7, 2011. The parties have agreed	
9	to extend the dates for Freescale's Opposition and ChipMOS's Reply. The parties' proposed	
10	revised briefing schedule is as follows:	
11	ChipMOS' Opening Brief: October 17, 2011	
12	Freescale's Opposition Brief: November 7, 2011	
13	ChipMOS's Reply Brief: November 14, 2011	
14	This request for an extension is supported by the Declaration of Shanèe Y. W. Nelson	
15	being filed herewith.	
16	DATED: September 27, 2011 Respectfully submitted,	
17	COOLEY LLP	
18	RONALD S. LEMIEUX VID R. BHAKAR	
19	SHANÉE Y.W. NELSON	
20	By: <u>/s/ Shanèe Y. W. Nelson</u> SHANÉE Y. W. NELSON	
21	Attorneys for Defendant and Counterclaimant	
22	ChipMOS Technologies, Inc.	
23		
24	In accordance with General Order No. 45, Section X(B), the above signatory attests that	
25	concurrence in the filing of this document has been obtained from the signatory below.	
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## Case 5:09-cv-03689-PSG Document 159 Filed 10/06/11 Page 3 of 5 DATED: September 27, 2011 JONES DAY GREG L. LIPPETZ JACQUELINE K. S. LEE By: /s/ Jacqueline K. S. Lee JACQUELINE K. S. LEE Attorneys for Plaintiff and Counterclaim-Defendant Freescale Semiconductor, Inc.

1	<b>DECLARATION OF SHANÉE Y. W. NELSON</b>	
2	I, Shanèe Y. W. Nelson, declare	
3	1. I am an attorney at the law firm of Cooley LLP, counsel in this action for	
4	Defendant and Counterclaimant ChipMOS Technologies, Inc. ("ChipMOS"). I have personal	
5	knowledge of the facts contained within this declaration, and if called as a witness, could testify	
6	competently to the matters contained herein.	
7	2. On Friday, September 23, 2011 I contacted Jacqueline Lee, counsel for Freescale,	
8	requesting Freescale's agreement to modify the briefing schedule set by the Court's	
9	September 22, 2011 Order to accommodate the international travel schedule of Ron Lemieux,	
10	counsel for ChipMOS. Mr. Lemieux's travel plans were booked several weeks prior to the	
11	Court's Order.	
12	3. The parties have conferred and agreed to an extension of time to file the	
13	Opposition and Reply briefs regarding ChipMOS' Motion for Reconsideration pursuant to the	
14	schedule requested in the Stipulated Request.	
15	4. There have been no previous modifications to the briefing schedule set in the	
16	Court's September 22, 2011 Order.	
17	5. The requested time modification will have no effect on any other deadlines set by	
18	the Court or on the schedule for this case.	
19	I declare under penalty of perjury that to the best of my knowledge the foregoing is true	
20	and correct. Executed on September 27, 2011 in Palo Alto, California.	
21	//GL	
22	/s/ Shanèe Y. W. Nelson Shanèe Y. W. Nelson	
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1	<u>ORDER</u>
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3	PURSUANT TO STIPULATION, IT IS SO ORDERED.
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5	Dated:
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7	Jerem H gg
8	Jerem Hogg Inited States District Judge
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